


CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. Glen D. O'Neill, 1969; United States Citizen	DOCKET NO. MAGISTRATE'S CASE NO. 23-07618MJ
Complaint for violation of Title 36 Code of Federal Regulations § 261.5(c), 261.52(b)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:	
<p>Count One: On or about October 17, 2020, in the District of Arizona, Glen D. O'Neill used an explosive in violation of a local order, in violation of Title 36, Code of Federal Regulations, Section 261.52(b).</p> <p>Count Two: On or about October 17, 2020, in the District of Arizona, Glen D. O'Neill caused timber, trees, slash, brush or grass to burn without authorization by permit; in violation of Title 36, Code of Federal Regulations, Section 261.5(c).</p>	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:	
<p>On October 17, 2020, Glen D. O'Neill and three other individuals were target shooting in the area located off Forest System Road (FSR) 4436 in Redington Pass in the Santa Catalina Ranger District, Coronado National Forest in the District of Arizona. O'Neill and the others used various firearms, including a rifle and a shotgun, to shoot at a binary explosive compound more commonly known as Tannerite, ultimately causing a container of Tannerite to explode.</p> <p>Beginning on October 17, 2020 through on or about November 12, 2020, a wildfire of approximately fifty acres spread through the area. The cause of the fire was determined to be use of exploding target material. Law enforcement recovered various pieces of evidence from the area where the wildfire originated, including a shotgun and remnants of a Tannerite container, which led law enforcement to contact O'Neill.</p> <p>On October 30, 2020, O'Neill was interviewed outside of his residence. O'Neill admitted to being at an unofficial shooting area off FSR 4436 in Redington Pass on October 17, 2020. He indicated that he and his friends were target shooting with numerous types of firearms, including his Mosin-Nagant rifle, and that he brought, mixed, and shot at Tannerite containers. O'Neill stated that at some point at least one target exploded, and that a wildfire started in the grasses around the target area sometime later. He also explained that he and the group left the area after the wildfire started.</p>	
MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE: Not applicable	
DETENTION REQUESTED <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	SIGNATURE OF COMPLAINANT MARK SANBURN Digitally signed by MARK SANBURN Date: 2023.08.31 00:18:02 -07'00' OFFICIAL TITLE & NAME: USDA Forest Service Law Enforcement Officer, Mark Sanburn
Subscribed to and sworn before me telephonically.	
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE August 31, 2023

¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54
Reviewing AUSA Christine A. Melton